

RECEIVED

APR 21 1992

Federal Communications Commission
Office of the Secretary

SOUTHERN NATURAL GAS

ORIGINAL
FILE

April 20, 1992

Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Comments - Notice of Proposed Rule Making,
ET Docket No. 92-9; FCC 92-20

Gentlemen and Ladies:

Southern Natural Gas Company (SNG) hereby submits an original and nine (9) copies of its initial comments regarding the FCC's Notice of Proposed Rule Making in the matter of "Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies", ET Docket No. 92-9.

SNG is an interstate pipeline company whose primary business is the purchase, sale and transportation of natural gas. SNG has pipeline operations in Alabama, Florida, Georgia, Louisiana, Mississippi, South Carolina, Tennessee and Texas.

SNG's microwave network is made up of 122 licensed stations operating in the 1850-2200 MHz fixed microwave band. This microwave network is used for voice, data, telemetry, and control. Telemetry data provided by the microwave network allows SNG to monitor pipeline pressures, temperatures, flow rates, and system loading. Control data is used to monitor and control unmanned automated compressor stations as well as pipeline pressure and flow control valves. Almost all SNG field voice communications, including much radio and even emergency communications, are normally carried by microwave.

The following are SNG's comments to FCC 92-20 by paragraph:

Comments:

General: SNG does not oppose setting aside bandwidth for new technologies but we are concerned that a reallocation of 220 MHz bandwidth in the 1.85 - 1.99, 2.11 - 2.15, and 2.16 - 2.20 GHz bands would jeopardize our large capital investment in equipment used in these bands and remove future flexibility for communications to our facilities.

Office of the Secretary
Federal Communications Commission
April 20, 1992
Page -2-

Footnote 17: SNG feels that tax certificates should also be given to 2 GHz fixed microwave licensees who move from the 2 GHz band to some higher band microwave. Limiting the tax certificates to licensees who are able to migrate to non-radio alternative media rewards the licensees whose communications system can be easily moved from radio to fiber and penalizes everyone else. If it is offered to all private 2 GHz users, the band might clear faster with less negotiation problems.

Paragraph 20: The proposed reaccommodation of existing 2 GHz users to fixed microwave bands above 3 GHz is like tearing down a steel bridge and replacing it with a rope bridge. Can the FCC really convince businesses that future investment in microwave equipment is a safe one? Who's to say that so-called emerging technologies won't need bandwidth at the frequencies above 3 GHz within the next few years. If existing users are to reaccommodate to bands above 3 GHz, we must have some form of commitment that the bands we move to are safe from reallocation for some fixed period of time.

Although many parties may respond to this comment by saying that this is further reason that existing users of the 2 GHz fixed microwave band should move to non-radio media such as fiber or satellite, SNG feels that neither fiber nor satellite can provide us with a communications system as reliable, flexible, and economical as microwave radio.

Paragraph 24: We do feel that the fifteen-year transition period would be sufficient to permit use of the current radio equipment through its useful life. However, the presumption that fixed microwave systems in rural areas could operate indefinitely as secondary users is unreasonable. These 2 GHz fixed services are used as a backbone for an entire network of communications; therefore, it is unreasonable to place the user in a situation where it risks its entire system on some of the links being licensed as secondary with the possibility of having to cease operation upon complaints. SNG feels that only the major metropolitan areas should lose their co-primary status

Office of the Secretary
Federal Communications Commission
April 20, 1992
Page -3-

after the transition period. Microwave systems in rural areas should retain their co-primary status. In fact, the ability to stay co-primary is the only way fixed microwave systems could continue to operate indefinitely in rural areas.

Footnote 20: The likelihood that an incumbent 2 GHz licensee will receive any kind of windfall from negotiations seems very unlikely. Besides the obvious cost to incumbent 2 GHz licensees to move to different equipment, the cost of personnel to negotiate these matters, training for personnel on new equipment, test equipment, and additional spare parts would most often eliminate any windfall that an incumbent user might receive for their frequencies.

We encourage the FCC to be as specific as possible when the rule making is released. We must have a very clear and defined path to follow that takes into account the expenditures and time required to change frequencies so that we can plan for the future.

Very truly yours,



Brad Diard
Engineer

BAD/mw

cc: Messrs. P. E. Alexander
L. N. Wheeler
M. D. Caudill
J. W. Saunders
J. R. Overstreet
T. L. Kinne (INGAA)
Ms. J. H. Parker